

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

NATIONAL FORGE COMPANY, *et al.*,

Debtor.

OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF NATIONAL FORGE  
COMPANY,

Plaintiff,

and

OFFICIAL COMMITTEE OF RETIREES OF  
NATIONAL FORGE COMPANY,

Intervenors,

v.

E. ROGER CLARK both Individually and as  
an Officer and Director of National Forge  
Company; et al.,

Defendants.

Civil Action No. 04-21 ERIE

**AFFIDAVIT OF PHILLIP R. SIMONS**

I, Phillip R. Simons, after being duly sworn according to law, depose and say the following:

1. I, Phillip R. Simons, am a former employee of National Forge Company.
2. During my employment with National Forge Company I accumulated approximately 2,239 shares of stock through my IRA plan.

3. On or about April 13, 1999, National Forge Company redeemed all of the shares of the Class B Common Stock from my IRA account.

4. National Forge Company paid the funds to me by check and/or wire transfer from National City Bank of Pennsylvania.

5. All statements contained in this Affidavit are true and correct to the best of my knowledge, information and belief.

  
Phillip R. Simons

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS.  
COUNTY OF ~~ERIE~~ Warren )

Before me, the undersigned authority, personally appeared PHILLIP R. SIMONS, who, being duly sworn according to law, deposes and says that the facts set forth in the foregoing Affidavit are true and correct to the best of his knowledge, information and belief.

Phillip R. Simons

Sworn to and subscribed before me

this 13 day of July, 2005.

Michelle L. Bova  
Notary Public

